

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

TRUEPOSITION, INC.,

Plaintiff,

v.

LM ERICSSON TELEPHONE COMPANY
(Telefonaktiebolaget LM Ericsson), QUALCOMM
INC., ALCATEL-LUCENT, S.A., THIRD
GENERATION PARTNERSHIP PROJECT a/k/a
3GPP, and EUROPEAN TELECOMMUNICATIONS
STANDARDS INSTITUTE,

Defendants.

CIVIL ACTION
2:11-cv-04574-RFK

**DEFENDANT EUROPEAN TELECOMMUNICATIONS
STANDARDS INSTITUTE'S MOTION FOR AN
ORDER EXTENDING ETSI'S TIME TO RESPOND TO
TRUEPOSITION, INC.'S AMENDED COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 6(b)(1), defendant European Telecommunications Standards Institute ("ETSI") hereby moves the Court for an Order extending ETSI's time to respond to the Amended Complaint of plaintiff TruePosition, Inc. ("TruePosition") until 30 days after jurisdictional discovery of ETSI has been completed. The grounds for this Motion are set forth in the accompanying Memorandum of Law and other supporting documents.

Oral argument is respectfully requested.

WHEREFORE, defendant ETSI respectfully requests that the Court grant this Motion and issue an Order extending ETSI's time to respond to TruePosition's Amended Complaint until 30 days after jurisdictional discovery of ETSI has been completed.

Respectfully submitted,

Dated: February 16, 2012

/s/ Richard S. Taffet

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CERTIFICATE OF SERVICE

I, Derek Care, hereby certify that on February 16, 2012, I caused true and correct copies of the following to be served on all parties to this litigation by ECF and first class mail:

1. Defendant European Telecommunications Standards Institute's Motion For An Order Extending ETSI's Time To Respond To TruePosition, Inc.'s Amended Complaint, dated February 16, 2012 (the "Motion");
2. Memorandum of Law In Support of the Motion, dated February 16, 2012;
3. Declaration Of William S.D. Cravens In Support of the Motion, dated February 16, 2012; and
4. Proposed Order.

Dated: February 16, 2012

/s/ Derek Care
Derek Care